

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SPECIAL TREE COMMUNITY SERVICES,
LLC d/b/a CC REHAB (Evan Baatz, Bart
Daugerty and David Wutke),

Plaintiff,

Case No. 2:22-cv-12520

Honorable Laurie J. Michaelson
Magistrate Judge: Curtis Ivy, Jr.

-v-

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

MARTIN A. HOGG (P76312)
Miller & Tishler, P.C.
Attorney for Plaintiff
28470 W. 13 Mile Road, Suite 300
Farmington Hills, MI 48334
(248) 945-1040 Fax: (248) 536-5042
mhogg@msapc.net

JOSHUA T. CHRISTOPHER (P74986)
HEATHER J. THATCHER (P83844)
Zausmer, P.C.
Attorneys for Defendant
32255 Northwestern Highway, Suite
225
Farmington Hills, MI 48334-1574
(248) 851-4111 Fax: (248) 851-0100
jchristopher@zausmer.com
hthatcher@zausmer.com

NOTICE OF CONFLICT WALL TO TRIBUNAL

To: Hon. Laurie J. Michaelson
All Counsel of Record

Pursuant to Michigan Rule of Professional Conduct 1.10, Notice is
hereby given that:

Zausmer, P.C.
32255 Northwestern Highway, Suite 225, Farmington Hills, MI 48334-1574
146 Monroe Center St., NW, Suite 1200, Grand Rapids, MI 49503-2844

1. Joshua J. Thomas, formerly of Miller & Tischler, P.C., has become associated with Zausmer, P.C.
2. Joshua J. Thomas has been screened by Zausmer, P.C. from any participation in the above referenced matter. Zausmer, P.C. screening procedures include the following:
 - a. Joshua J. Thomas and all attorneys and staff of Zausmer, P.C. were asked to identify all matters in which they know a conflict exists which would trigger establishment of the conflict wall. The firm also checks internal records to identify all matters in which Joshua J. Thomas' former law firm employer currently appears as adverse counsel.
 - b. Once a conflict wall situation was identified, a specific staff member was instructed to physically label all paper files relating to any screened matters. The label identifies that Joshua J. Thomas is screened from the file, so there will be no question regarding who may view the contents of the file.
 - c. Notice has been circulated to all attorneys and staff to advise that a conflict wall has been established, identifying that Joshua J. Thomas has been screened from all current matters where Miller & Tischler, P.C. is currently, or was previously, adverse including the instant matter. The notice specified the conduct appropriate to observe the conflict wall.
3. The procedures outlined in Paragraph 2 were followed in Joshua J. Thomas' association to the firm.
4. Joshua J. Thomas is paid a set salary and will not share in any fees obtained in the above referenced matter.

Respectfully submitted,

ZAUSMER, P.C.

/s/ Joshua T. Christopher

JOSHUA T. CHRISTOPHER (P74986)

HEATHER J. THATCHER (P83844)

Attorneys for Defendant State Farm

32255 Northwestern Hwy, Suite 225

Farmington Hills, MI 48334

(248) 851-4111

Dated: November 22, 2023

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses as directed on the pleadings on **November 22, 2023** by:

☐ US MAIL ☐ FAX ☐ EMAIL ☐ UPS ☐
FEDERAL EXPRESS ☒ E-FILE ☐ E-SERVE

Nakisha Hogan
NAKISHA HOGAN

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